

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DAVID AMBROSE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BOSTON GLOBE MEDIA PARTNERS, LLC,

Defendant.

Case No. 1:22-cv-10195-RGS

**ASSENTED TO MOTION TO EXTEND PLAINTIFF'S TIME TO FILE AN
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiff David Ambrose respectfully submits this assented to motion for a fourteen (14) day extension of time to submit an Opposition to the Motion to Dismiss in this action. Having conferred with Defendant about that intention, Plaintiff Ambrose also respectfully requests the Court set a deadline of August 17, 2022, for Defendant to file a Reply in Support of the Motion to Dismiss.

In support of this motion, Plaintiff respectfully states as follows:

1. Plaintiff filed the Complaint in this matter on February 5, 2022.
2. Defendant responded to Plaintiff's Complaint by filing a Motion to Dismiss on April 29, 2022.
3. Plaintiff filed a First Amended Complaint on May 20, 2022.
4. Defendant responded to Plaintiff's First Amended Complaint by filing a Motion to Dismiss on June 21, 2022.
5. The additional briefing time will allow Plaintiff to more fully address the issues raised by Defendant's Motion to Dismiss. Plaintiff has conferred with Defendant about this

request, and Defendant has consented, in return for setting a Reply deadline of August 17, 2022.

WHEREFORE, Plaintiff requests that the Court enter an Order granting this

Assented To Motion and setting the following deadlines:

- Plaintiff's Opposition to Defendant's Motion to Dismiss the Complaint shall be due **July 19, 2022**.
- Defendant's Reply in Support of the Motion to Dismiss shall be due **August 17, 2022**.

Dated: June 24, 2022

Respectfully submitted,

/s/ David S. Godkin

David S. Godkin (BBO#196530)
James E. Kruzer (BBO#670827)
BIRNBAUM & GODKIN, LLP
1 Marina Park Drive, Suite 1410
Boston, MA 02210
(617) 307-6100
godkin@birnbaumgodkin.com
kruzer@birnbaumgodkin.com

BURSOR & FISHER, P.A.

Joshua D. Arisohn
Philip L. Fraietta
888 Seventh Avenue
New York, NY 10019
Tel: (646) 837-7150
Fax: (212) 989-9163
E-Mail: jarisohn@bursor.com
pfraietta@bursor.com

BURSOR & FISHER, P.A.

Christopher R. Reilly
701 Brickell Avenue, Suite 1420
Miami, FL 33131
Tel: (305) 330-5512
Fax: (305) 679-9006
E-Mail: creilly@bursor.com

Attorneys for Plaintiff and the Putative Class

CERTIFICATE OF COMPLIANCE

I, David S. Godkin, hereby certify that in accordance with Local Rule 7.1(a)(2), counsel for Plaintiff and counsel for Defendant have conferred in good faith regarding the resolution of this motion. Counsel for Defendant has indicated that Defendant assents to this motion.

/s/ David S. Godkin

David S. Godkin (BBO#196530)

CERTIFICATE OF SERVICE

I, David S. Godkin, hereby certify that on June 24, 2022, a true and accurate copy of the foregoing document was filed electronically with the clerk of court via CM/ECF, which will then send a notification of such filing to all counsel of record and those who have registered for notice.

/s/ David S. Godkin

David S. Godkin (BBO#196530)